

## *EXHIBIT B*





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October 25, 2019

***Via Email***

Kyle W. Farrar  
Kaster, Lynch, Farrar & Ball, LLP  
1010 Lamar, Suite 1600  
Houston, TX 77002  
[kyle@fbtrial.com](mailto:kyle@fbtrial.com)

**Re: *Susman, et al. v. The Goodyear Tire & Rubber Co.***  
**Case No. 8:18-cv-00127**

Dear Kyle:

I have received your letter of October 23 on the subject of Goodyear's claim file document production. Your request to hire a copy service to scan/copy the claim file documents is not acceptable to us. As of October 24, the claim files identified for production fill 37 boxes and the search is ongoing. The vast majority of those files are property damage claims files which will not contain information beyond what is currently in your possession relevant to any substantial similarity inquiry. (See the exemplar files produced with Goodyear's opposition brief to your motion to compel.) Only a very small percentage of the files will contain information of the kind you were seeking to discover through your motion to compel. Additionally, we have over 40 boxes of lawsuit files which are being reviewed for privilege. Further, the documents cannot be simply scanned/copied and produced without due consideration to the terms and conditions of the Protective Order and the need to protect the privacy interests of any plaintiff/claimant. In short, proceeding as you suggest is not efficient, not cost-effective, and does not adequately protect the privacy interests of the individuals involved. For each and all of these reasons, we intend to make the files available in Akron at Goodyear's headquarters for your inspection beginning November 4. You can identify those parts of the production you wish to have scanned and/or copied, and based on the volume of documents requested we can hopefully reach agreement on how that second phase of the production will be handled.





Kyle W. Farrar  
October 25, 2019  
Page 2

Very truly yours,

GREENSFELDER, HEMKER & GALE, P.C.

By



Edward S. Bott, Jr.

ESB/rlv

cc: Paul E. Godlewski (via email)  
Michael F. Coyle (via email)  
Jennifer D. Tricker (via email)

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